

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

WEST VIRGINIA CHAMBER OF)
COMMERCE, INCORPORATED;)
GEORGIA ASSOCIATION OF)
MANUFACTURERS, INC.; INDIANA)
CHAMBER OF COMMERCE, INC.;)
INDIANA COAL COUNCIL, INC.,)
KENTUCKY CHAMBER OF)
COMMERCE, INC.; KENTUCKY COAL)
ASSOCIATION, INC.; NORTH)
CAROLINA CHAMBER; OHIO)
CHAMBER OF COMMERCE;)
PENNSYLVANIA CHAMBER OF)
BUSINESS AND INDUSTRY;)
PENNSYLVANIA COAL)
ASSOCIATION; SOUTH CAROLINA)
CHAMBER OF COMMERCE; THE)
VIRGINIA CHAMBER OF)
COMMERCE; THE VIRGINIA COAL)
ASSOCIATION, INCORPORATED;)
WEST VIRGINIA COAL)
ASSOCIATION, INC.; and WISCONSIN)
INDUSTRIAL ENERGY GROUP, INC.)
Petitioners,)
v.) No. 12-1182
UNITED STATES ENVIRONMENTAL)
PROTECTION AGENCY,)
Respondent.)

**DISCLOSURE STATEMENT OF THE WEST VIRGINIA CHAMBER
OF COMMERCE, INCORPORATED, GEORGIA ASSOCIATION OF
MANUFACTURERS, INC., INDIANA CHAMBER OF COMMERCE,
INC., INDIANA COAL COUNCIL, INC., KENTUCKY CHAMBER
OF COMMERCE, INC., KENTUCKY COAL ASSOCIATION, INC.,
NORTH CAROLINA CHAMBER, OHIO CHAMBER OF
COMMERCE, PENNSYLVANIA CHAMBER OF BUSINESS AND**

**INDUSTRY, PENNSYLVANIA COAL ASSOCIATION, SOUTH
CAROLINA CHAMBER OF COMMERCE, THE VIRGINIA
CHAMBER OF COMMERCE, THE VIRGINIA COAL
ASSOCIATION, INCORPORATED, WEST VIRGINIA COAL
ASSOCIATION, INC., AND
WISCONSIN INDUSTRIAL ENERGY GROUP, INC.**

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure and Circuit Rule 26.1, I, the undersigned counsel of record for the WEST VIRGINIA CHAMBER OF COMMERCE, INCORPORATED, the GEORGIA ASSOCIATION OF MANUFACTURERS, INC., the INDIANA CHAMBER OF COMMERCE, INC., the INDIANA COAL COUNCIL, INC., the KENTUCKY CHAMBER OF COMMERCE, INC., the KENTUCKY COAL ASSOCIATION, INC., the NORTH CAROLINA CHAMBER, the OHIO CHAMBER OF COMMERCE, the PENNSYLVANIA CHAMBER OF BUSINESS AND INDUSTRY, the PENNSYLVANIA COAL ASSOCIATION, the SOUTH CAROLINA CHAMBER OF COMMERCE, THE VIRGINIA CHAMBER OF COMMERCE, THE VIRGINIA COAL ASSOCIATION, INCORPORATED, the WEST VIRGINIA COAL ASSOCIATION, INC., and the WISCONSIN INDUSTRIAL ENERGY GROUP, INC., certify that:

1. The WEST VIRGINIA CHAMBER OF COMMERCE, INCORPORATED is a not for profits corporation. It has no parent companies, subsidiaries or affiliates that have issued shares or debt securities to the public;

2. The GEORGIA ASSOCIATION OF MANUFACTURERS, INC. is a not for profits corporation. It has no parent companies, subsidiaries or affiliates that have issued shares or debt securities to the public;
3. The INDIANA CHAMBER OF COMMERCE, INC. is a not for profits corporation. It has no parent companies, subsidiaries or affiliates that have issued shares or debt securities to the public;
4. The INDIANA COAL COUNCIL, INC. is a not for profits corporation. It has no parent companies, subsidiaries or affiliates that have issued shares or debt securities to the public;
5. The KENTUCKY CHAMBER OF COMMERCE, INC. is a not for profits corporation. It has no parent companies, subsidiaries or affiliates that have issued shares or debt securities to the public;
6. The KENTUCKY COAL ASSOCIATION, INC. is a not for profits corporation. It has no parent companies, subsidiaries or affiliates that have issued shares or debt securities to the public;
7. The NORTH CAROLINA CHAMBER is a not for profits corporation. It has no parent companies, subsidiaries or affiliates that have issued shares or debt securities to the public;

8. The OHIO CHAMBER OF COMMERCE is a not for profits corporation. It has no parent companies, subsidiaries or affiliates that have issued shares or debt securities to the public;
9. The PENNSYLVANIA CHAMBER OF BUSINESS AND INDUSTRY is a not for profits corporation. It has no parent companies, subsidiaries or affiliates that have issued shares or debt securities to the public;
10. The PENNSYLVANIA COAL ASSOCIATION is an unincorporated trade association organized and existing under the laws of the Commonwealth of Pennsylvania. Because the PENNSYLVANIA COAL ASSOCIATION is a continuing association of numerous businesses and organizations operated for the purpose of promoting the general commercial, professional, legislative, and other interests of its membership, no listing of its members that have issued shares or debt securities to the public is required under Circuit Rule 26.1(b).
11. The SOUTH CAROLINA CHAMBER OF COMMERCE is a not for profits corporation. It has no parent companies, subsidiaries or affiliates that have issued shares or debt securities to the public;

12.THE VIRGINIA CHAMBER OF COMMERCE is a not for profits corporation. It has no parent companies, subsidiaries or affiliates that have issued shares or debt securities to the public;

13.THE VIRGINIA COAL ASSOCIATION, INCORPORATED is a not for profits corporation. It has no parent companies, subsidiaries or affiliates that have issued shares or debt securities to the public;

14.The WEST VIRGINIA COAL ASSOCIATION, INC. is a not for profits corporation. It has no parent companies, subsidiaries or affiliates that have issued shares or debt securities to the public;

15.The WISCONSIN INDUSTRIAL ENERGY GROUP, INC. is a not for profits corporation. It has no parent companies, subsidiaries or affiliates that have issued shares or debt securities to the public.

These representations are made in order that the judges of this court may determine the need for recusal.

Dated: April 18, 2012.

Respectfully submitted,

By Counsel

/s/ Gale Lea Rubrecht

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Chamber of Commerce, Incorporated,
Georgia Association of Manufacturers,
Inc., Indiana Chamber of Commerce,
Inc., Indiana Coal Council, Inc.,
Kentucky Chamber of Commerce, Inc.,
Kentucky Coal Association, Inc., North
Carolina Chamber, Ohio Chamber of
Commerce, Pennsylvania Chamber of
Business and Industry, Pennsylvania
Coal Association, South Carolina
Chamber of Commerce, The Virginia
Chamber of Commerce, The Virginia
Coal Association, Incorporated, West
Virginia Coal Association, Inc., and
Wisconsin Industrial Energy Group,
Inc.*

CERTIFICATE OF SERVICE

I, Gale Lea Rubrecht, counsel for the West Virginia Chamber of Commerce, Incorporated, the Georgia Association of Manufacturers, Inc., the Indiana Chamber of Commerce, Inc., the Indiana Coal Council, Inc., the Kentucky Chamber of Commerce, Inc., the Kentucky Coal Association, Inc., the North Carolina Chamber, the Ohio Chamber of Commerce, the Pennsylvania Chamber of Business and Industry, the Pennsylvania Coal Association, the South Carolina Chamber of Commerce, The Virginia Chamber of Commerce, The Virginia Coal Association, Incorporated, the West Virginia Coal Association, Inc., and the Wisconsin Industrial Energy Group, Inc., hereby certify that on this 18th day of April, 2012, one copy of the foregoing DISCLOSURE STATEMENT was sent by U.S. Mail, postage prepaid, to each of the following:

The Honorable Lisa P. Jackson
Administrator
U.S. Environmental Protection Agency
3000 Ariel Rios Federal Building
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Washington, D.C. 20004

The Honorable Scott Fulton
General Counsel of U.S. EPA
Office of General Counsel (2311)
Correspondence Control Unit
U.S. EPA Headquarters
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The Honorable Eric H. Holder, Jr.
Attorney General of the United States
U.S. Department of Justice
Robert F. Kennedy Building
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The Honorable Ignacia S. Moreno
Assistant Attorney General
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/s/Gale Lea Rubrecht
GALE LEA RUBRECHT